

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

GREATER ST. LOUIS CONSTRUCTION)	
LABORERS WELFARE FUND, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 4:12-cv-00791-CDP
)	
GENERAL SITE SERVICES, LLC,)	
)	
Defendant.)	

**MOTION FOR A CREDITOR'S BILL IN EQUITY
AND TO PIERCE THE CORPORATE VEIL**

Pursuant to Rule 69(a) of the Federal Rules of Civil Procedure and pursuant to the established procedures of the State of Missouri relating to proceedings in aid of execution, plaintiffs move the Court for equitable relief in the form of a creditor's bill, to allow plaintiffs to proceed to satisfy the judgment entered in this case from the property of General Site Services, LLC, which is not subject to execution by normal means available at law.

Plaintiffs move the Court to pierce the corporate veil of General Site Services, LLC, and permit the plaintiffs to satisfy the judgment from its alter ego, GSS, LLC and from the personal assets of its owner, John Dickinson.

Plaintiffs have no adequate legal remedy. Further grounds supporting the use of a creditor's bill and piercing the corporate veil are set forth in the accompanying memorandum of law.

Respectfully submitted,

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/s/ Matthew J. Gierse
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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing was electronically filed with the Clerk of the Court on May 22, 2013 and copies were sent to the following non-participants in Electronic Filing by first class mail:

John Dickinson
General Site Services, LLC
PO Box 410619
Creve Coeur, MO 63141

/s/ Matthew J. Gierse